

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492
Case No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Weisman

**DECLARATION OF STEVE W. BERMAN IN SUPPORT OF
SETTLEMENT CLASS PLAINTIFFS' MOTION FOR RESOLUTION OF A DISPUTE
CONCERNING THE EFFECTIVE DATE**

I, Steve W. Berman, declare as follows:

1. I am the managing partner of Hagens Berman Sobol Shapiro LLP and have been appointed Settlement Class Counsel in this litigation. I make this declaration in support of Settlement Class Plaintiffs' Motion for Resolution of a Dispute Concerning the Effective Date.

2. In order to facilitate the implementation of the Second Amended Class Action Settlement Agreement and Release, and to alleviate any risk to the NCAA resulting from the appeal filed by Timothy J. McIlwain, Settlement Class Counsel have offered to create an escrow fund in the entire amount sought by McIlwain (including interest).

3. Settlement Class Plaintiffs remain willing to implement such an escrow fund.
I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 24, 2019

/s/ Steve W. Berman